

Mr. George Nickell
Nickell Moulding Company, Inc.
P.O. Box 1502
Elkhart, Indiana 46515

Re: **039-11064**
First Significant Revision to
FESOP 039-5880-00174

Dear Mr. Nickell:

Nickell Moulding Company, Inc. was issued a permit on December 10, 1996 for a wood moulding manufacturing and surface coating source. A letter requesting changes to this permit was received on June 15, 1999. Pursuant to the provisions of 326 IAC 2-8-11.1 a **significant** permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of two (2) moulding machines, known as COMP01 and COMP02 with single and combination of HAPs as well as VOC emission limits to avoid the applicability of the New source toxics control (326 IAC 2-1-3.4) and New facilities; general reduction requirements (326 IAC 8-1-6).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

Nickell Moulding Company, Inc.
Elkhart, Indiana
Permit Reviewer: MES

Page 2 of 2
Permit Revision 039-11064
ID 039-00174

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Frank P. Castelli, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

FPC/MES

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

Nickell Moulding Company, Inc.
3015 Mobile Drive
Elkhart, Indiana 46515

Nickell Moulding Company, Inc. is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 039-5880-00174	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 10, 1996

First Administrative Amendment 039-8250, issued on April 3, 1997

First Minor Permit Modification: MMF 039-8447	Page Affected: 24
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 29, 1997

First Significant Permit Revision 039-11064	Pages Affected: 4 - 6, 12, 12a, 15, 16, 16a, 18, 21 and 29 Section Added D.3 on 25a, 25b, 29a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a wood moulding manufacturing source.

Authorized Individual: George Nickell
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515-1502
SIC Code: 2431
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

Benchmark Side

- a) Four (4) surface coating machines (two spray machines, #1 and #2, one (1) patina spray machine and one (1) stripper machine), equipped with airless spray applicators, capacity: 7,500 board feet of wood per hour, each.
- b) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D1.

Nickell Side

- a) Five (5) high-volume low-pressure spraying machines, capacity: 7,500 board feet of wood per hour, each.
- b) Two (2) spray-type flowcoaters, capacity: 7,500 board feet of wood per hour each.
- c) One (1) high-volume low-pressure spray repair booth, capacity: 7,500 board feet of wood per hour.
- d) One (1) stain wiping area, capacity: 7,500 board feet of wood per hour.
- e) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D2.
- f) One (1) portable striping machine, capacity: 7,500 board feet of wood per hour.
- g) Two (2) moulding compo machines, known as COMPO1, installed in February 1999, and COMPO2, to be installed, each exhausting through Stack E16, capacity: 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute, each.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- b) Combustion source flame safety purging on startup.
- c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- f) Paved and unpaved roads and parking lots with public access.
- g) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- h) Bag dumping of Sorbond = 0.069 pounds per hour or 16.5 pounds per day

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

Indiana Department of Environmental Management,
Permits Branch, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- B) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- 2) If IDEM, OAM fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- c) **Right to Operate After Application of Renewal** [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.
- B.18 **Permit Amendment or Modification** [326 IAC 2-8-10] [326 IAC 2-8-11.1]
(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.19 **Minor Permit Modification** [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]
a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms

and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

- e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326IAC 2-8-16]

- a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as in 326 IAC 5-1-4.
- b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- a) All equipment that potentially might emit pollutants into the ambient air shall be properly

operated and maintained.

- b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

C.6 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and

technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

- c) An automatic measurement was taken when the process was not operating; or
- d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.11 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.12 Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5 percent of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.13 General Record Keeping Requirements

- a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available

SECTION D.1 FACILITY OPERATION CONDITIONS

Four (4) surface coating machines (two spray machines, #1 and #2, one (1) patina spray machine and one (1) stripper machine), equipped with airless spray applicators, capacity: 7,500 board feet of wood per hour, each.

Five (5) high-volume low-pressure spraying machines, capacity: 7,500 board feet of wood per hour, each.

Two (2) spray-type flowcoaters, capacity: 7,500 board feet of wood per hour each.

One (1) high-volume low-pressure spray repair booth, capacity: 7,500 board feet of wood per hour.

One (1) stain wiping area, capacity: 7,500 board feet of wood per hour.

One (1) portable striping machine, capacity: 7,500 board feet of wood per hour.

Emissions Limitations [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound

a) The volatile organic compound (VOC) delivered to the coating applicators shall be limited to less than one hundred (100) tons per rolling 12-month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

b) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

Airless Spray Application
Electrostatic Spray Application
Heated Airless Spray Application
Brush or Wipe Application
High-Volume Low-Pressure HVLP

Air-Assisted Airless Spray Application
Electrostatic Bell or Disc Application
Roller Coating
Dip-and-Drain Application
Aerosol Spray Cans

High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray. High-volume low-pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions from the entire source shall be limited as follows:

a) A single hazardous air pollutant (HAP) emissions shall be limited to less than ten (10) tons per rolling 12-month period.

b) Any combination of HAPs emissions shall be limited to less than twenty-five (25) tons per rolling 12-month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

SECTION D.3 FACILITY OPERATION CONDITIONS

- g) Two (2) moulding compo machines, known as COMPO1, installed in February 1999, and COMPO2, to be installed, each exhausting through Stack E16, capacity: 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute, each.

Emissions Limitations [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compound (326 IAC 8-1-6)

The volatile organic compound (VOC) delivered to COMPO1 and COMPO2 shall be limited to less than 25 tons of VOC per twelve (12) consecutive month period each. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.3.2 New Source Toxics Control (326 IAC 2-4.1-1)

The hazardous air pollutant emissions from COMPO1 and COMPO2 each shall be limited to less than:

- a) Ten (10) tons per twelve (12) consecutive month period for a single HAP, and
- b) Twenty five (25) tons per twelve (12) consecutive month period for the combination of HAPs.

D.3.3 Hazardous Air Pollutants

The hazardous air pollutant emissions from the entire source shall be limited as follows:

- a) A single hazardous air pollutant (HAP) emissions shall be limited to less than ten (10) tons per rolling 12-month period.
- b) Any combination of HAPs emissions shall be limited to less than twenty-five (25) tons per rolling 12-month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.4 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Volatile Organic Compounds (VOC) and HAPs

Compliance with the VOC and HAPs usage limitations contained in Condition D.3.1 and Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.7 VOC and HAPs Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated at the end of each month based on the total volatile organic compound, single HAP and combination of all HAPs usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.8 Volatile Organic Compound (VOC) Usage

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in Condition D.3.1. The records shall contain a minimum of the following:

- a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- b) The VOC content (**weight percent**) of each material used;
- c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable, and
- d) MSDS sheets for all materials used for coatings.

D.3.9 Hazardous Air Pollutant (HAP)

The Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- b) The HAP content (**weight percent**) of each material used;
- c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable,
- d) Identification of the facility or facilities associated with the usage of each HAP, and
- e) MSDS sheets for all materials used for coatings.

D.3.10 Quarterly Reporting

A quarterly summary to document compliance with Conditions D.3.1, D.3.2 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

Nickell Moulding Company, Inc.
Elkhart, Indiana
Permit Reviewer: MES

First Significant Permit Revision
039-11064-00174
Amended by: MES

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
FESOP No.: F 039-5880-00114
Facility: All Surface Coating Operations (Nickell and Benchmark Sides)
Parameter: VOC and HAPs Delivered to the Applicators Including Clean-up Solvents
Limit: Less than 10 Tons per Rolling 12-Month Period of any Single HAP.
Less than 25 Tons per Rolling 12-Month Period of any Combination of HAPs.
Less than 100 Tons per Rolling 12-Month Period of VOC.

Year: _____

Month	Total VOC (tons)	Combination of HAPs (tons)	Worst Case Single HAP (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Nickell Moulding Company, Inc.
Elkhart, Indiana
Permit Reviewer: MES

First Significant Permit Revision
039-11064-00174
Amended by: MES

Page29a of 29
FESOP No. F 039-5880-00174

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Permit No.: 039-11064-00174
Facility: COMPO1 and COMPO2
Parameter: VOC Delivered to the Applicators
Limit: Less than 25 Tons per Twelve (12) Consecutive Month Period, Each

Year: _____

Month	VOC Delivered (tons)		VOC Delivered (tons)		VOC Delivered (tons)	
	This Month		Previous 11 Months		12 Month Total	
	COMPO1	COMPO2	COMPO1	COMPO2	COMPO1	COMPO2

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: Nickell Moulding Company, Inc.
Source Location: 3015 Mobile Drive, Elkhart, Indiana 46515
County: Elkhart
FESOP: F 039-11064-00174
SIC Code: 2431
Permit Reviewer: Frank P. Castelli

On July 26, 1999, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Nickell Moulding Company, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a wood moulding manufacturing and surface coating source. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On August 20, 1999, Sara R. Cupp of Triad Engineering, submitted comments on the proposed FESOP on behalf of Nickell Moulding Company. The permit language, if changed, has deleted language as ~~strikeouts~~ and new language as **bold**. The comments are as follows:

Comment 1:

The draft Significant Permit Revision indicates "COMP01" and "COMP02" throughout. Although only a subtle difference, NMC refers to the machines as COMPO machines, and therefore, Triad had suggested they be referred to as "COMPO1" and "COMPO2", not COMP01 and COMP02. Please change the zeros to the letter "O" throughout the permit.

Response 1:

Throughout the entire revision, the zeros have been changed to the letter "O" in COMPO1 and COMPO2.

Comment 2:

NMC believes that because of the limits already requested by them to avoid the New Source Toxics Control Rule, they will be able to limit actual source-wide emissions, including existing emission sources AND the addition of the COMPO machines, below Title V levels and continue operating as a FESOP source.

Therefore NMC requests that the language in the draft Significant Permit Revision that indicates "the source shall apply for a Part 70 Operating Permit within twelve (12) months of issuance of this significant permit revision to change the existing FESOP F 039-5880-00174 to a Part 70 Operating Permit" be removed.

NMC realizes that if once the COMPO machines are operational and actual operating data reveals that this will not be possible, a Part 70 Permit would be required prior to exceeding FESOP limits.

In addition, Triad requests the following:

- a) Change Section A.4, Part 70 Permit Applicability (Page 5 of 29), to read as it originally did in the FESOP issued December 10, 1996.
- b) Remove Section B.26, Part 70 Application (Page 15 of 29).
- c) Re-write Section C.1, Emission Limitations (Page 16 of 29), to indicate that the FESOP source-wide limits apply to the equipment permitted December 10, 1996 as well as to the COMPO machines covered by the Significant Permit Revision.
- d) Change the FESOP Quarterly Report (page 29 of 29) to include COMPO1 and COMPO2 emissions, in addition to the December 10, 1996 emission sources. (The Quarterly Reports found on page 29a, 29b, and 29c would still be necessary then to document compliance with limits taken on the COMPO machines to avoid BACT, and the New Source Toxics Control Rule.)

Response 2:

The statement, "the source shall apply for a Part 70 Operating Permit within twelve (12) months of issuance of this significant permit revision to change the existing FESOP F 039-5880-00174 to a Part 70 Operating Permit" is no longer applicable and has been removed from the draft letter.

The original application stated that this source would have to apply for a Part 70 Operating Permit due to the proposed modification. Now that this source believes that it can comply with the limitations of a FESOP the following revisions were required:

Condition A.4 has reverted back to the condition in F 039-5880-00174 since the source now desires to operate under a FESOP rather than a Part 70 permit for the COMPO machines as follows:

~~A.4~~ Part 70 Permit Applicability [326 IAC 2-7-2]

~~This stationary source is required to apply for a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:~~

- ~~a) It is a major source, as defined in 326 IAC 2-7-1(22);~~
- ~~b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).~~

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

Condition B.3 of F 039-5880-00174 has been reinstated as follows:

~~B.3 Deleted in First Significant Permit Revision 039-11064.~~

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

Condition B.5 has been revised as follows:

B.5 ~~Termination of Right to Operate~~ [326 IAC 2-7-3][326 IAC 2-7-4(a)(1)(A)]

~~The Permittee's right to operate this source terminates twelve (12) months after beginning operation of equipment listed in Section D.3 unless a timely and complete Part 70 application is submitted to IDEM, OAM within twelve (12) months from the date the source begins operating as a Part 70 source consistent with 326 IAC 2-7-4.~~

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

Conditions B.18 has been revised as follows:

B.18 ~~Permit Amendment or Modification~~ [326 IAC 2-8-10] [326 IAC 2-8-11.1][326 IAC 2-7-10.5]

~~a) The Permittee must comply with the requirements of 326 IAC 2-7-10.5 whenever the Permittee seeks to amend or modify this source. If the proposed change is not applicable to 326 IAC 2-7-10.5, then the Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1.~~

~~b) Any application requesting an amendment or modification of this permit or source according to 326 IAC 2-7-10.5, 326 IAC 2-8-10, or 326 IAC 2-8-11.1 shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule. If the application is submitted pursuant to 326 IAC 2-7-10.5 it must be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)] Changes requested pursuant to 326 IAC 2-8-10(14) must now be submitted as a Part 70 source modification.~~

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

b) Any application requesting an amendment or modification of this permit shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

- c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]**

Condition B.19 of F 039-5880-00174 has been reinstated as follows:

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- a) **A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.**
- b) **Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).**
- c) **An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).**
- d) **The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]**

The cites in Condition B.25 have been revised from Part 70 to those pertaining to a FESOP as follows:

B.25 Annual Fee Payment ~~[326 IAC 2-7-19]~~~~[326 IAC 2-7-5(7)]~~[326 IAC 2-8-4(6)]****[326 IAC 2-8-16]****

Furthermore, Condition B.26 has been deleted since the source desire to operate all equipment under the terms of a FESOP.

~~B.26 Part 70 Application (326 IAC 2-7)~~

~~The source shall submit a Title V operating permit application within twelve (12) months of the issuance date of this significant permit revision.~~

Condition C.1 has been revised since the source desires to operate under a FESOP rather than a Part 70 permit for the COMPO1 and COMPO2 machines as follows:

C.1 Overall Source Limit (326 IAC 2-8)

a) The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

a1) Pursuant to 326 IAC 2-8:

- i) ~~The potential to emit any regulated pollutant from the units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996 shall~~

be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

- ii) ~~The potential to emit any individual hazardous air pollutant (HAP) from the units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996 shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and~~
- iii) ~~The potential to emit any combination of HAPs from the units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.~~
- 2) ~~This condition shall include units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996 including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.~~
- 3) ~~Section D of this permit contains independently enforceable provisions to satisfy this requirement.~~
- b) ~~Pursuant to 326 IAC 2-8-11.1(f)(1)(B) Section D.3 is not required to comply with this condition. The source will be subject to the Part 70 permit program when operation of the equipment listed in D.3 begins.~~
 - 1) **The potential to emit any regulated pollutant from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.**
 - 2) **The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and**
 - 3) **The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.**
- b) **This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.**
- c) **Section D of this permit contains independently enforceable provisions to satisfy this requirement.**

Condition C.11 has been changed to:

- G.11 ~~Emission Statement~~ [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(e)][326 IAC 2-6]
- a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

- 1) ~~Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- 2) ~~Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~
- b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~
- c) ~~The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.~~

C.11 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- a) **The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:**

**Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**
- b) **The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.**

Condition D.1 a) has been revised to eliminate the 11/12ths reduction for the VOC limit as follows:

D.1.1 Volatile Organic Compound

- a) **The volatile organic compound (VOC) delivered to the coating applicators shall be limited to less than one hundred (100) not exceed 90.75 tons per rolling 12-month period. Therefore, the requirements of 326 IAC 2-7 do not apply.**

Condition D.1.2 a) and b) have been revised to cite the single and combination of HAPs limits for the entire source which are no longer truncated to 11/12th of the limits.

D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions from the entire source shall be limited as follows:

- a) A single hazardous air pollutant (HAP) emissions shall **be limited to less than ten (10)** ~~not exceed 8.25~~ tons per rolling 12-month period.
- b) Any combination of HAPs emissions shall **be limited to less than twenty-five (25)** ~~not exceed 22.0~~ tons per rolling 12-month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

The Quarterly Report Form has been revised to reflect the above changes in VOC and HAPS emission limits to eliminate the 11/12ths requirements as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
FESOP No.: F 039-5880-00114
Facility: All Surface Coating Operations (Nickell and Benchmark Sides)
Parameter: VOC and HAPs Delivered to the Applicators Including Clean-up Solvents
Limit: **Less than ten (10)** 8.25 Tons per Rolling 12-Month Period of any Single HAP.
Less than twenty-five (25) 22.0 Tons per Rolling 12-Month Period of any Combination of HAPs.
Less than one hundred (100) 90.75 Tons per Rolling 12-Month Period of VOC.

Year: _____

Month	Total VOC (tons)	Combination of HAPs (tons)	Worst Case Single HAP (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

In addition, the two (2) Quarterly Report Forms limiting HAPs emissions from COMPO1 and COMPO2 have been deleted as follows because the Quarterly Report Form for the entire source guarantees that if the entire source meets these HAPs emissions, then COMPO1 and COMPO2 meet these HAPs emission limits to avoid applicability of 326 IAC 2-4.1-1. Note that the Quarterly Reporting Form limiting VOC input to the applicators from COMPO1 and COMPO2 to avoid the applicability of 326 IAC 8-1-6 has been retained.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Permit No.: 039-11064-00174
Facility: COMPO1 and COMPO2
Parameter: Single HAP Delivered to the Applicators Including Clean-up Solvents
Limit: Less than Ten (10) Tons per Twelve (12) Consecutive Month Period, Each

Year: _____

Month	Worst Case Single HAP Usage (tons)		Worst Case Single HAP Usage (tons)		Worst Case Single HAP Usage (tons)	
	This Month		Previous 11 Months		12 Month Total	
	COMPO1	COMPO2	COMPO1	COMPO2	COMPO1	COMPO2

9 — No deviation occurred in this quarter.

9 — Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Permit No.: 039-11064-00174
Facility: COMPO1 and COMPO2
Parameter: Combination of HAPs Delivered to the Applicators Including Clean-up Solvents
Limit: Less than Twenty-five (25) Tons per Twelve (12) Consecutive Month Period, Each.

Year: _____

Month	Combination of HAPs Usage (tons)		Combination of HAPs Usage (tons)		Combination of HAPs Usage (tons)	
	This Month		Previous 11 Months		12 Month Total	
	COMPO1	COMPO2	COMPO1	COMPO2	COMPO1	COMPO2

9 — No deviation occurred in this quarter.

9 — Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit: Deleted language appears as ~~strikeouts~~ and new language appears as **bold**.

1. The wording of Condition D.1 b) has been updated as follows:

D.1.1 Volatile Organic Compound

- b) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

~~Airless Spray Application~~

~~[Includes Aerosol Spray Cans since there is only one orifice & no atomizing air horns]~~

~~Air-Assisted Airless Spray Application~~

~~Electrostatic Spray Application~~

~~Electrostatic Bell or Disc Application~~

~~Heated Airless Spray Application~~

~~Roller Coating~~

~~Brush or Wipe Application~~

~~Dip-and-Drain Application~~

~~[Includes High-Volume Low-Pressure HVLP]~~

Airless Spray Application

Electrostatic Spray Application

Heated Airless Spray Application

Brush or Wipe Application

High-Volume Low-Pressure HVLP

Air-Assisted Airless Spray Application

Electrostatic Bell or Disc Application

Roller Coating

Dip-and-Drain Application

Aerosol Spray Cans

~~High-volume low-pressure (HVLP) spray means technology used to applied coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray.~~

High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray. High-volume low-pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

2. Condition D.3.3 has been added to make sure that the HAPs FESOP limits are met for the entire source and all subsequent conditions have been renumbered. Also Condition D.3.3 has been added to the reporting condition as follows:

D.3.3 Hazardous Air Pollutants

The hazardous air pollutant emissions from the entire source shall be limited as follows:

- a) **A single hazardous air pollutant (HAP) emissions shall be limited to less than ten (10) tons per rolling 12-month period.**
- b) **Any combination of HAPs emissions shall be limited to less than twenty-five (25) tons per rolling 12-month period.**

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.910 Quarterly Reporting

A quarterly summary to document compliance with Conditions D.3.1, **D.3.2** and D.3.23 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for the First Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Nickell Moulding Company, Inc.
Source Location:	3015 Mobile Drive, Elkhart, Indiana 46515
County:	Elkhart
SIC Code:	2431
Operation Permit No.:	F 039-5880-00174
Operation Permit Issuance Date:	December 10, 1996
Significant Permit Revision No. 1:	F 039-11064-00174
Permit Reviewer:	Frank P. Castelli

The Office of Air Management (OAM) has reviewed a revision application from Nickell Moulding Company, Inc. relating to the operation of wood moulding manufacturing and surface coating source. The equipment involved in this modification consists of the following:

Two (2) moulding compo machines, known as COMP01, installed in February 1999, and COMP02, to be installed, each exhausting through Stack E16, capacity: 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute, each.

History

On June 15, 1999, Nickell Moulding Company, Inc. submitted an application to the OAM requesting approval to add two (2) moulding machines to the existing plant. Nickell Moulding Company, Inc. was issued a FESOP on December 13, 1996. Note, COMPO1 was installed in February 1999 and is currently using E-Compo which has no regulated pollutants. The second COMPO2 machine will be installed within 18 months of issuance.

Source Definition

The source consists of two (2) contiguous plants, known as the Benchmark and Nickell sides both located at the same address. Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they were considered one (1) source during the FESOP review.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
E26	Two (2) Moulding Machines	1.0	2.5	9,775	68

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 15, 1999.

Emission Calculations

Each of the two (2) Compo machines uses a maximum of 55.25 pounds per hour of the synthetic wood paste, Compo. The VOC content of this material is 12.0 percent by weight, all of which is the HAP toluene. Therefore, the potential VOC and toluene emissions from each machine are 55.25 pounds per hour \times 0.12 = 6.63 pounds per hour, equivalent to 29.0 tons per year. The total potential emissions from this proposed modification (both machines) are 58.0 tons per year of VOC (toluene).

Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM ₁₀	0.00
SO ₂	0.00
VOC	58.0
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Toluene	58.0
TOTAL	58.0

Justification for Modification

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1)(B). This permit revision is significant because the potential-to-emit VOC emissions from the addition of two (2) moulding machines exceeds 25 tons per year.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	18.0
PM ₁₀	14.6
SO ₂	negligible
VOC	99.0
CO	negligible
NO _x	negligible

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for F 039-5880-00174, issued December 10, 1996.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP Permit Revision.

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Two (2) moulding machines	0.00	0.00	0.00	48.0	0.00	0.00	19.8

This revision to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification. The moulding machines are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ because the moulding are considered millwork under SIC 2431, and not wood furniture or furniture components.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-7-2 (Part 70 Permit Applicability)

The source must apply for a Part 70 Operating Permit within twelve (12) months of issuance of this revision since the source elected to change its FESOP to a Part 70 Operating Permit.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New source toxics control)

The source has agreed to limit a single HAP to less than ten (10) tons per year and the combination of all HAPs to less than twenty-five (25) tons per year from each of the two (2) moulding machines COMP01 and COMP02. The single HAPs from each of the two (2) machines will be limited to 9.9 tons per year. Therefore, the requirements of this rule are not applicable.

326 IAC 6-3-2 (Process Operations)

There are no particulate matter emissions from this modification and therefore this rule is not applicable.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Each of the two (2) machines has the potential to emit more than 25 tons per year of VOC, and therefore, 326 IAC 8-1-6 could be applicable to each machine. This source has agreed to limit the VOC delivered to each of the two (2) machines to less than 25 tons per twelve (12) consecutive month period. Therefore, this source will not be required to install Best Available Control Technology (BACT).

326 IAC 8-2-12 (Wood furniture and cabinet coating)

The two (2) moulding machines are not subject to 326 IAC 8-2-12 because the wood and/or composite mouldings manufactured by these machines are not considered wood furniture, furnishings or art objects.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The two (2) moulding machines have applicable compliance monitoring conditions as specified below:

- (a) The amount of VOC delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis for COMP01 and COMP02. Material Data Safety Sheets (MSDS) must be kept on file for each material and cleanup solvent used during each quarter.
- (b) The amount of each single HAP and combination of all HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis for COMP01 and COMP02. Material Data Safety Sheets (MSDS) must be kept on file for each material and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70) and in order to avoid the applicability of 326 IAC 2-1-3.4 and 326 IAC 8-1-6.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a wood moulding manufacturing source.

~~Responsible Official~~ **Authorized Individual:** George Nickell
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515-1502
SIC Code: 2431
County Location: Elkhart
County Status: ~~Maintenance for ozone, Attainment for all other criteria pollutants~~
Source Status: ~~Synthetic Minor Source, FESOP Program~~ **Federally Enforceable State
Operating Permit (FESOP)
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act**

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

Benchmark Side

- a) Four (4) surface coating machines (two spray machines, #1 and #2, one (1) patina spray machine and one (1) stripper machine), equipped with airless spray applicators, capacity: 7,500 board feet of wood per hour, each.

- b) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D1.

Nickell Side

- a) Five (5) high-volume low-pressure spraying machines, capacity: 7,500 board feet of wood per hour, each.
- b) Two (2) spray-type flowcoaters, capacity: 7,500 board feet of wood per hour each.
- c) One (1) high-volume low-pressure spray repair booth, capacity: 7,500 board feet of wood per hour.
- d) One (1) stain wiping area, capacity: 7,500 board feet of wood per hour.
- e) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D2.
- f) One (1) portable striping machine, capacity: 7,500 board feet of wood per hour.
- g) **Two (2) moulding compo machines, known as COMP01, installed in February 1999, and COMP02, to be installed, each exhausting through Stack E16, capacity: 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute, each.**

~~A.4 FESOP Applicability [326 IAC 2-8-2]~~

~~This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).~~

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to apply for a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- a) **It is a major source, as defined in 326 IAC 2-7-1(22);**
- b) **It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

~~B.3 Permit Term [326 IAC 2-8-4(2)]~~

~~This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.~~

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-7-3][326 IAC 2-7-4(a)(1)(A)]

~~The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.~~

The Permittee's right to operate this source terminates twelve (12) months after beginning operation of equipment listed in Section D.3 unless a timely and complete Part 70 application is submitted to IDEM, OAM within twelve (12) months from the date the source begins operating as a Part 70 source consistent with 326 IAC 2-7-4.

~~B.18 Administrative Permit Amendment [326 IAC 2-8-10]~~

- ~~a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).~~
- ~~b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).~~
- ~~c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

~~B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]~~

- ~~a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.~~
- ~~b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).~~
- ~~c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).~~
- ~~d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]~~

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1][326 IAC 2-7-10.5]

- a) The Permittee must comply with the requirements of 326 IAC 2-7-10.5 whenever the Permittee seeks to amend or modify this source. If the proposed change is not applicable to 326 IAC 2-7-10.5, then the Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1.**
- b) Any application requesting an amendment or modification of this permit or source according to 326 IAC 2-7-10.5, 326 IAC 2-8-10, or 326 IAC 2-8-11.1 shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule. If the application is submitted pursuant to 326 IAC 2-7-10.5 it must be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

- c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the**

request. [326 IAC 2-8-10(b)(3)] Changes requested pursuant to 326 IAC 2-8-10(14) must now be submitted as a Part 70 source modification.

B.25 Annual Fee Payment ~~[326 IAC 2-8-4(6)]~~ ~~[326 IAC 2-8-16]~~ [326 IAC 2-7-19][326 IAC 2-7-5(7)]

- a) The Permittee shall pay annual fees to IDEM, OAM, ~~consistent with the fee schedule established in 326 IAC 2-8-16:~~ **within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- b) **Failure to pay may result in administrative enforcement action, or revocation of this permit.** ~~referral to the Office of Attorney General for collection, or other appropriate measures.~~
- c) ~~The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~
- dc) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date,~~ **The Permittee shall may call the following telephone numbers: 1-800-451-6027 or 317-233-0479 0425 (ask for OAM, Data Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.**

B.26 Part 70 Application (326 IAC 2-7)

The source shall submit a Title V operating permit application within twelve (12) months of the issuance date of this significant permit revision.

C.1 Overall Source Limit (326 IAC 2-8)

~~Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365-day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365-day period for any individual HAP of 24 tons per 365-day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.~~

- a) **The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.**
 - 1) **Pursuant to 326 IAC 2-8:**
 - (i) **The potential to emit any regulated pollutant from the units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996 shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.**
 - (ii) **The potential to emit any individual hazardous air pollutant (HAP) from the units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996 shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and**
 - (iii) **The potential to emit any combination of HAPs from the units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December**

10, 1996, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

- 2) This condition shall include units in Sections D.1 and D.2 of FESOP #039-5880-00174 issued on December 10, 1996, including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.**
- 3) Section D of this permit contains independently enforceable provisions to satisfy this requirement.**
- b) Pursuant to 326 IAC 2-8-11.1(f)(1)(B) Section D.3 is not required to comply with this condition. The source will be subject to the Part 70 permit program when operation of the equipment listed in D.3 begins.**

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, **unless otherwise stated in this permit:**

- a) ~~Visible emissions~~ Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.**
- b) ~~Visible emissions~~ Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.**

~~C.11 Emission Reporting [326 IAC 2-6]~~

- ~~a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:~~

~~Indiana Department of Environmental Management,
Data Support Section, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

- ~~b) This annual emission statement required by this permit shall be timely if:~~
 - ~~1) Delivered by U.S. mail and postmarked on or before the date it is due; or~~
 - ~~2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~

C.11 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual**

emission statement shall meet the following requirements:

- 1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);**
 - 2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.**
- b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:**
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**
- c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.**

SECTION D.3

FACILITY OPERATION CONDITIONS

- g) Two (2) moulding compo machines, known as COMP01, installed in February 1999, and COMP02, to be installed, each exhausting through Stack E16, capacity: 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute, each.**

Emissions Limitations [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compound (326 IAC 8-1-6)

The volatile organic compound (VOC) delivered to COMP01 and COMPO2 shall be limited to less than 25 tons of VOC per twelve (12) consecutive month period each. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.3.2 New Source Toxics Control (326 IAC 2-4.1-1)

The hazardous air pollutant emissions from COMP01 and COMPO2 each shall be limited to less than:

- a) Ten (10) tons per twelve (12) consecutive month period for a single HAP, and**
- b) Twenty five (25) tons per twelve (12) consecutive month period for the combination of HAPs.**

D.3.3 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC) and HAPs

Compliance with the VOC and HAPs usage limitations contained in Condition D.3.1 and Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC and HAPs Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated at the end of each month based on the total volatile organic compound, single HAP and combination of all HAPs usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.7 Volatile Organic Compound (VOC) Usage

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in Condition D.3.1. The records shall contain a minimum of the following:

- a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- b) The VOC content (weight percent) of each material used;
- c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable, and
- d) MSDS sheets for all materials used for coatings.

D.3.8 Hazardous Air Pollutant (HAP)

The Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- b) The HAP content (weight percent) of each material used;
- c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable,

- d) Identification of the facility or facilities associated with the usage of each HAP, and
- e) MSDS sheets for all materials used for coatings.

D.3.9 Quarterly Reporting

A quarterly summary to document compliance with Conditions D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Permit No.: 039-11064-00174
Facility: COMP01 and COMP02
Parameter: VOC Delivered to the Applicators
Limit: Less than 25 Tons per Twelve (12) Consecutive Month Period, Each

Year: _____

Month	VOC Delivered (tons)		VOC Delivered (tons)		VOC Delivered (tons)	
	This Month		Previous 11 Months		12 Month Total	
	COMP01	COMP02	COMP01	COMP02	COMP01	COMP02

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Permit No.: 039-11064-00174
Facility: COMP01 and COMP02
Parameter: Single HAP Delivered to the Applicators Including Clean-up Solvents
Limit: Less than Ten (10) Tons per Twelve (12) Consecutive Month Period, Each

Year: _____

Month	Worst Case Single HAP Usage (tons)		Worst Case Single HAP Usage (tons)		Worst Case Single HAP Usage (tons)	
	This Month		Previous 11 Months		12 Month Total	
	COMP01	COMP02	COMP01	COMP02	COMP01	COMP02

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Permit No.: 039-11064-00174
Facility: COMP01 and COMP02
Parameter: Combination of HAPs Delivered to the Applicators Including Clean-up Solvents
Limit: Less than Twenty-five (25) Tons per Twelve (12) Consecutive Month Period, Each.

Year: _____

Month	Combination of HAPs Usage (tons)		Combination of HAPs Usage (tons)		Combination of HAPs Usage (tons)	
	This Month		Previous 11 Months		12 Month Total	
	COMP01	COMP02	COMP01	COMP02	COMP01	COMP02

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed FESOP Significant Permit Modification No. 039-11064-00174.